

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Medical Administration Solutions, LLC, and David Owens,)	
)	
Plaintiffs,)	CIVIL ACTION NO.
)	1:23-cv-05120-MHC
vs.)	
)	
Truist Bank Inc, and Todd Zerbenski,)	
)	
Defendants.)	

**DEFENDANTS' MOTION TO STAY DISCOVERY
AND PRE-TRIAL DEADLINES**

Defendants Truist Bank and Todd Zerbenski hereby file this Motion to Stay Discovery and Pre-Trial Deadlines in light of Defendants' pending Motion to Dismiss Plaintiffs' Amended Complaint. (*See* Doc. 14). In support of this Motion, Defendants incorporate their Memorandum of Law contemporaneously filed herewith.

WHEREFORE, Defendants respectfully request that the Court grant this Motion to Stay Discovery and Pre-Trial Deadlines.

Respectfully submitted this 8th day of January, 2024.

BRADLEY ARANT BOULT CUMMINGS LLP

/s/ Nancy H. Baughan

Nancy H. Baughan
Georgia Bar No. 042575
Chase C. Lyndale

Georgia Bar No. 183762
nbaughan@bradley.com
clyndale@bradley.com

Promenade Tower
1230 Peachtree Street NE
Atlanta, GA 30309
(404) 868-2013
(404) 868-2010 (facsimile)

Counsel for Defendants

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), the undersigned certifies that this document has been prepared in accordance with Local Rule 5.1(B).

/s/ Nancy H. Baughan

Nancy H. Baughan

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CERTIFICATE OF SERVICE

I certify that I have on this day served a true copy of the foregoing **DEFENDANTS’ MOTION TO STAY DISCOVERY AND PRE-TRIAL DEADLINES** upon all parties to this matter by electronically filing a copy of same with the Court’s CM/ECF system, which will automatically send an electronic copy to all counsel of record.

This 8th day of January, 2024.

/s/ Nancy H. Baughan
Nancy H. Baughan